



The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TERRIE L. WILLIAMS,
Plaintiff,

v.

METROPOLITAN LIFE INSURANCE
COMPANY, a New York Corporation; and
AMERICAN AIRLINES, INC., a Delaware
Corporation,
Defendants.

Case No. CV10-0751 RBL

**STIPULATION AND [PROPOSED]
ORDER ALLOWING AMENDMENT
OF COMPLAINT TO SUBSTITUTE
CORPORATE DEFENDANT**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties¹ through
their respective undersigned attorneys, as follows:

1. The Court's August 19, 2010 Minute Order Setting Trial Date, Pretrial Dates and
Ordering Mediation, set the "Deadline for the FILING of any motion to join parties not later than
September 20, 2010." (Docket No. 15)

2. Defendant American Airlines, Inc.'s "Answer to Plaintiff's Complaint for
Damages" previously filed and served on Plaintiff on July 16, 2010, expressly alleged American
Airlines, Inc. is not a proper defendant in this action. (Docket No. 12 at p. 6, 18-21)

¹ On August 22, 2011, the Court entered an order dismissing Metropolitan Life Insurance Company as a defendant
in this lawsuit. As a result, the only remaining parties are Plaintiff Terrie L. Williams and Defendant American
Airlines, Inc. (Docket No. 24)

STIPULATION AND [PROPOSED] ORDER ALLOWING
AMENDMENT TO COMPLAINT AND SUBSTITUTION
Cause No. CV10-0751 RBL

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1 3. The parties, having met and conferred in good faith, have agreed to stipulate to
2 allow Plaintiff to now amend her complaint to substitute the correct corporate defendant,
3 "American Airlines, Inc. Long Term Disability Plan Trust," in place of the existing named
4 corporate defendant, American Airlines, Inc.

5 4. The parties further stipulate and request that the previous Answer of Defendant
6 American Airlines, Inc. filed on July 16, 2010 (with the exception of the Eleventh Affirmative
7 Defense) shall be considered to be the Answer of Defendant American Airlines, Inc. Long Term
8 Disability Plan Trust.

9 5. The Parties further stipulate and request that the previous Motion for Summary
10 Judgment filed by American Airlines, Inc. filed on June 21, 2011 shall be considered to be a
11 Motion for Summary Judgment filed by Defendant American Airlines, Inc. Long Term
12 Disability Plan Trust. (Docket No. 17)

13 Dated: this 26th day of August, 2011.

14 FOR PLAINTIFF:

 FOR DEFENDANT:

15 /s/Elizabeth LePley

/s/ Kenneth R. O'Brien

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21 Attorneys for Plaintiff
22 Terrie L. Williams

Attorneys for Defendants
American Airlines, Inc. and American Airlines,
Inc. Long Term Disability Plan Trust

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STIPULATION AND[PROPOSED] ORDER ALLOWING
AMENDMENT TO COMPLAINT AND SUBSTITUTION - 2
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ORDER

IT IS ORDERED that Defendant American Airlines, Inc. is hereby dismissed without prejudice under the terms set forth above and Defendant American Airlines, Inc. Long Term Disability Plan Trusts is hereby substituted as a named defendant in its place under the terms of the parties' stipulation as set forth above.

DATED this 29th day of August, 2011.


THE HONORABLE RONALD B. LEIGHTON

Presented by:

s/ Kenneth R. O'Brien
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STIPULATION AND[PROPOSED] ORDER ALLOWING
AMENDMENT TO COMPLAINT AND SUBSTITUTION - 3
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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 600 University Street, Suite 3200, Seattle, WA 98101-3122. On August 26, 2011, I electronically filed **STIPULATION AND [PROPOSED] ORDER ALLOWING AMENDMENT OF COMPLAINT TO SUBSTITUTE CORPORATE DEFENDANT** with the Clerk of the Court using the CM/ECF system which will send notification of such filing The Honorable Ronald B. Leighton and to the following:

**Elizabeth Lepley
Joseph Koplin
Moschetto & Koplin, Inc., P.S.
1800 – 112th Avenue NE, Ste. 300 E
Bellevue, WA 98004-2954**

And I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

[Not applicable]

I declare under penalty of perjury under the laws of the State of Washington that the above is true and correct. Executed on August 26, 2011, at Sacramento, California.

/s/ Anna M. Robertson
ANNA M. ROBERTSON
arobertson@littler.com

**STIPULATION AND[PROPOSED] ORDER ALLOWING
AMENDMENT TO COMPLAINT AND SUBSTITUTION
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